

Amendments to the Drawings:

The attached replacement drawing sheet makes changes to Fig. 2 and replaces the original sheet with Fig. 2.

Attachment: Replacement Sheet

REMARKS

Status of the Claims

Claims 1-30 are pending in this application, the independent claims being claims 1, 12, 13 and 23. By this Amendment, the title, the drawing and claims 1-13 and 17-23 are amended, and claims 25-30 are newly presented.

Summary of Official Action

In the Official Action, the title and drawings were objected to on formal grounds. Claim 12 was objected to under 37 C.F.R. 1.75(c), as being in improper form. Claims 1-23 were rejected under 35 U.S.C. 103(a), as unpatentable over U.S. Patent No. 6,732,079 (Kitner), in view of Giles et al., Meeting Customer Demand Through Mixed-Model Manufacturing (1997) and Schroer et al., Continuous Process Improvement the Quick Step Way (1998). Claim 24 was rejected under 37 U.S.C. 103(a), as unpatentable over the Kitner '079 Patent, the Giles publication and the Schroer publication, further in view of Kititsis et al., Petri Net Techniques for Process Planning Cost Estimation.

Reconsideration and withdrawal of the objections and rejections respectfully are requested in view of the above amendments and the following remarks.

Summary of the Examiner Interview

Applicant's attorney gratefully acknowledges the courtesies extended to him by the Examiner in granting a personal interview on January 25, 2006. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

In the interview, the Examiner clarified his statement at page 22 of the Official Action indicating that the application appears to disclose allowable subject matter that is not positively recited in the claims, and discussed four general concepts disclosed in the application that the Examiner stated may be allowable over the cited art: (1) nested

iterations/recursions (see Fig. 6); (2) multiple products/product lines (see Fig. 4); variable tact time (see, e.g., page 2, line 28 and Fig. 6); and the certain specific equations (see equations 1-5 listed at pages 12-14). The Examiner also suggested amending independent claim 1 to recite a "computer implemented system," and re-writing dependent claim 12 in independent form, to obviate objections to the form of these claims.

Formal Amendments

The title has been amended more clearly to describe the claimed invention, as requested by the Examiner. No new matter has been added.

Applicants have submitted replacement sheets of drawings including corrections to Fig. 2, as requested by the Examiner. No new matter has been added.

Claim Amendments

The formal objection to claim 12 and the rejections of the claims over the cited art respectfully are traversed. Nevertheless, without conceding the propriety of the objection and rejections, claim 12 has been re-written in independent form, and claims 1, 12, 13 and 23 have been amended more clearly to recite various novel features of the claimed invention, with particular attention to the Examiner's comments. Claim 2-11 and 17-22 have been amended to improve their form, consistent with the amendments to the independent claims. Newly presented claims 25-30 have been added to provide Applicants with additional scope of protection commensurate with the disclosure, including positive recitation of various features discussed at the personal interview. Support for the amendments may be found in the original application, e.g., in Fig. 6, as discussed in the personal interview. No new matter has been added.

Prior Art Distinguished

Applicants submit that the prior art fails to anticipate the claimed invention. Moreover, Applicants submit that there are differences between the subject matter sought to

be patented and the prior art, such that the subject matter taken as a whole would not have been obvious to one of ordinary skill in the art at the time the invention was made.

Specifically, Applicants submit that the cited art, taken individually or in any combination, fails to disclose or suggest the claimed computer implemented system, method or computer program product for drafting a supply plan/production plan including at least the features of *reiteratively* changing a distribution parameter and work force parameter, as disclosed in the present application (see Fig. 6; nested, iterative, recursive steps) and recited in claims 1, 12 and 13, and *reiteratively adjusting* the number of workers distributed to worker categories, *the tact time*, and the planned production volume allocated to each of plural production lines, as disclosed in the present application and recited in claim 23.

Conclusion

Applicants believe that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action and the personal interview, and submit that the application is in condition for allowance. Favorable consideration of the claims and passage to issue of the application at the Examiner's earliest convenience earnestly are solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

James A. Oliff
Registration No. 27,075

Christopher Philip Wrist
Registration No. 32,078

JAO:CPW/axl

Attachments:
Amendment Transmittal
Replacement Fig. 2

Date: February 17, 2006

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

<p>DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461</p>
--